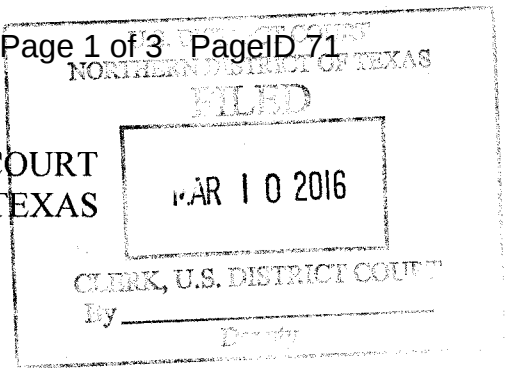


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

Case No. 3:16-MJ-078-BH

JOSE FLORES (03)
a/k/a "Gordo"

MOTION FOR DETENTION

The United States moves for detention of defendants, **Jose Flores**, also known as Gordo, pursuant to Crim. Rule 32.1(a)(6) and 18 U.S.C. §3143(a).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

_____ Crime of violence (18 U.S.C. §3156);

_____ Maximum sentence life imprisonment or death

XXX 10 + year drug offense

_____ Felony, with two prior convictions in above categories

XXX Serious risk defendant will flee

_____ Serious risk obstruction of justice

_____ Felony involving a minor victim

_____ Felony involving a firearm, destructive device, or any other
dangerous weapon

_____ Felony involving a failure to register (18 U.S.C. § 2250)

_____ Petition for Supervised Release Revocation was filed

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

XXX Defendant's appearance as required

_____ Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because (check one or both):

XXX Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

_____ Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

_____ Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

_____ Previous conviction for "eligible" offense committed while on pretrial bond

_____ Probable cause to believe Defendant violated terms of supervised release, FRCP 32.1(a)(6).

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

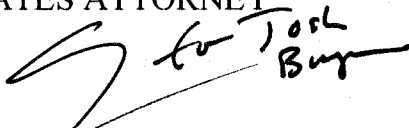
_____ At first appearance

XXX After continuance of 3 days (not more than 3).

DATED this 10th day of March, 2016.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

 for Josh
Burg

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the
defendant in accordance with the Federal Rules of Criminal Procedure on this 10th day of
March, 2016.

 for Josh
Burg

JOSHUA T. BURGESS
Assistant United States Attorney